

## 13G. Audit Program

Regulations: 180 NAC 4-004, 180 NAC 4-047.

**Criteria:** *Licensees must review the content and implementation of their radiation protection programs annually to ensure the following:*

- *Compliance with the Agency and DOT regulations, and the terms and conditions of the license;*
- *Occupational doses and doses to members of the public are as low as reasonably achievable (ALARA) (180 NAC 4-004); and*
- *Records of audits and other reviews of program content are maintained for 3 years.*

Appendix S contains a suggested audit program that is specific to the use of fixed gauges and is acceptable to Agency. All areas indicated in Appendix S may not be applicable to every licensee and may not need to be addressed during each audit. For example, licensees do not need to address areas which do not apply to their activities, and activities which have not occurred since the last audit need not be reviewed at the next audit.

Currently the Agency's emphasis in inspections is to perform actual observations of work in progress. As a part of their audit programs, applicants should consider performing unannounced audits of gauge users in the field to determine if, for example, Operating and Emergency Procedures are available, are being followed, etc.

The RSO needs to ensure that the annual audits are conducted, but does not necessarily need to do it himself/herself. In fact, if the RSO is one of the authorized gauge users, it may be beneficial for a qualified individual (e.g., radiation safety consultant, the corporate radiation safety office) who is not associated with day-to-day operations to conduct the audit. Specify who will perform this function.

It is essential that once identified, problems be corrected comprehensively and in a timely manner. The Agency will review the licensee's audit results and determine if corrective actions are thorough, timely, and sufficient to prevent recurrence. If violations are identified by the licensee and these steps are taken, the Agency can exercise discretion and may elect not to cite a violation. The Agency's goal is to encourage prompt identification and prompt, comprehensive correction of violations and deficiencies.

With regard to audit records, 180 NAC 4-047.01 requires licensees to maintain records of "... audits and other reviews of program content and implementation." The Agency has found audit records that contain the following information to be acceptable: date of audit, name of person(s) who conducted audit, persons contacted by the auditor(s), areas audited, audit findings, corrective actions, and follow-up.

### **Response From Applicant:**

- A statement that: "We will have an audit program."

**Note:** See Appendix S for a sample audit program. Audit programs need not be submitted with the application. The annual audit will be reviewed during an inspection.

